

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KAREN S. BROWN, AS TRUSTEE OF THE MLG TRUST,	:	
	:	Civil Action No. 1:09-CV-2043
	:	
Plaintiff,	:	JURY TRIAL DEMANDED
	:	
v.	:	JUDGE JONES
	:	
MARTIN L. GRASS,	:	(ELECTRONICALLY FILED)
	:	
Defendant.	:	

**JOINT PROPOSED
SPECIAL VERDICT QUESTIONS**

Plaintiff Karen Brown, as trustee of the MLG Trust, and Defendant Martin Grass, by their respective counsel, submit the following Joint Proposed Special Verdict Questions pursuant to Your Honor's Order dated July 28, 2011 at pages 5-6, paragraphs 6.4 and 6.5:

1. Do you find by a preponderance of the evidence that Plaintiff MLG Trust and Defendant Grass entered into a binding agreement for the sale of the MLG Trust's stock in Rumman Group, Inc. in or about March, 2002?

Yes _____

No _____

If answered Yes, proceed to Question No. 2

If answered No, you may return to the court room.

2. Do you find by a preponderance of the evidence that MLG Trust met all of its obligations to perform under the Stock Purchase Agreement?

Yes _____

No. _____

If you answered Yes, proceed to Question 3.

If you answered No, return to the courtroom.

3. Do you find by a preponderance of the evidence that Defendant Grass breached the March, 2002 Stock Purchase Agreement?

Yes _____

No _____

4. Do you find by a preponderance of the evidence that MLG Trust suffered damages as a proximate result of Defendant Grass's breach of the March, 2002 Stock Purchase Agreement?

Yes _____

No _____

If answered Yes, proceed to Question No. 4.

If answered No, you may return to the court room.

5. If you answered YES to Question Nos. 1 – 3, please state the amount of money necessary to compensate Plaintiff MLG Trust for the damages it suffered as a result of Defendant Grass's breach of the March, 2002 Stock Purchase Agreement.

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Respectfully submitted:

/s/ George A. Reihner
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Respectfully submitted:

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